

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

DANIEL LOVELACE and
HELEN LOVELACE, Individually, and as Parents of
BRETT LOVELACE, deceased,

Plaintiffs,

Vs.

No. 2:13-cv-02289 SHL-dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and
MARK P. CLEMONS,

Defendants.

DEFENDANT, DR. MARK P. CLEMONS', PRETRIAL DISCLOSURES

Defendant, Dr. Mark P. Clemons, pursuant to Rule 26(a)(3) of the Federal Rules of Civil
Procedure, provides the following pretrial disclosures:

- (i) **The Name And, If Not Previously Provided, The Address And Telephone Number Of Each Witness--Separately Identifying Those The Party Expects To Present And Those It May Call If The Need Arises**

Dr. Clemons expects to call the following witnesses:

1. Dr. Mark Clemons

Address has been previously provided.

2. Dr. Jay Werkhaven

Address has been previously provided.

3. Dr. Jerome Thompson

Address has been previously provided.

4. Edward Brundick, III, CIME, CFP

Address and phone number previously provided.

5. Kelly Kish, R.N.

9972 Parrish Drive
Lakeland, TN 38002
Telephone: 901-485-7793

6. Diane Dowdy, R.N.

Address and phone number previously provided.

Dr. Clemons may call the following witnesses:

7. Dr. Babu Rao Paidipalli

Address and phone number previously provided.

8. Grace Freeman, CRNA

Address and phone number previously provided.

9. Daniel Lovelace

Address and phone number known to Plaintiffs.

10. Helen Lovelace

Address and phone number known to Plaintiffs.

11. Curtis Lovelace

Address and phone number known to Plaintiffs.

12. Taylor Lovelace

Address and phone number known to Plaintiffs.

13. Dr. Timothy Martin

Address and phone number previously provided.

14. Dr. Ira Landsman

Address and phone number previously provided.

15. Dwayne Accardo, CRNA

Address and phone number previously provided.

16. Medical Records Custodian for Methodist LeBonheur Hospital Orthopedic Clinic

848 Adams Avenue,
Memphis, TN 38103
Telephone: 901-287-5437

17. Medical Records Custodian for Methodist LeBonheur Hospital

50 North Dunlap
Memphis, TN 38103
Telephone: 901-516-6000

18. Medical Records Custodian for Dr. John Buntin

312 N. Missouri
West Memphis, AR 72301
Telephone: 870-735-1673

19. Medical Records Custodian for Memphis Neurology

7645 Wolf River Circle
Germantown, TN 38138-1743
Telephone: 901-405-0275

20. Medical Records Custodian for Braces by Burris

126 W. Bond, West Memphis, AR 72301
Telephone: 870-735-7805

21. Medical Records Custodian for Children's Dental Group

303 Bancario, #11-12
Marion, AR 72364
Telephone: 870-739-2992

22. Medical Records Custodian for Day Spring Behavioral Health Services

2688 N. State Highway 77
Marion, AR 72364
Telephone: 870-739-1700

23. Medical Records Custodian for the Department of Veteran Affairs

1030 Jefferson Avenue
Memphis, TN 38104
Telephone: 901-523-8990

24. Medical Records Custodian for Mid-South Pediatrics
(Drs. Ukwe and Swami)

2921 Highway 77, Suite 21
Marion, AR 72364
Telephone: 870-739-5311

25. Medical Records Custodian for Crittenden Regional Hospital – Closed –

200 W. Tyler Avenue
West Memphis, AR 72301
Telephone: 870-735-1500

26. Medical Records Custodian for Dr. Samuel Meredith

1231 Arkansas 77, #1
Marion, AR 72364
Telephone: 870-735-4400

27. Medical Records Custodian for Crossridge Community Hospital

310 S. Falls Blvd.
Wynne, AR 72396
Telephone: 870-238-3300

28. Medical Records Custodian for UT Medical Group (Drs. Ward, Srinivasan and Schoumacher)

1407 Union Ave., Suite 700
Memphis, TN 38104
Telephone: 901-866-8864

29. Medical Records Custodian for Crittenden Regional Hospital Mid-South Minor Med

710 N. Missouri
West Memphis, AR 72301-3150
Telephone: 870-400-2296

30. Medical Records Custodian for Coast to Coast HealthStop

3900 Petro Road, Suite 111
West Memphis, AR 72301
Telephone: 870-732-0332

31. Medical Records Custodian for Women's Clinic of Forrest City

902 Holiday Drive, #102
Forrest City, AR 72335
Telephone: 870-633-0091

32. Medical Records Custodian for Day Spring Behavioral Services

2688 N. State Highway 77
Marion, AR 72364
Telephone: 870-739-1700

33. Any witnesses identified by co-defendants, Pediatric Anesthesiologists, P.A. and Babu Rao Paidipalli

50 North Dunlap
Memphis, TN 38103
Telephone: 901-287-6060

and

34. Any witnesses identified by plaintiffs.

(ii) Designation Of Those Witnesses Whose Testimony The Party Expects To Present By Deposition And, If Not Taken Stenographically, A Transcript Of The Pertinent Parts Of The Deposition

Dr. Clemons anticipates using all or portions of the depositions of Helen Lovelace and Daniel Lovelace subject to the Court's ruling on objections in the depositions pursuant to the Tennessee Rules of Evidence.

(iii) Identification Of Each Document Or Other Exhibit, Including Summaries Of Other Evidence--Separately Identifying Those Items The Party Expects To Offer And Those It May Offer If The Need Arises

Dr. Clemons expects to offer the following documents as exhibits:

1. PACU demonstrative photos;
2. Methodist LeBonheur Hospital/Ortho Clinic medical records;
3. Dr. Mark Clemons' medical records;

4. Methodist LeBonheur Hospital medical records;
5. Dr. John Buntin's medical records;
6. Memphis Neurology medical records;
7. Braces by Burris (photos and medical records);
8. Children's Dental Group records;
9. Day Spring Behavioral Health Services medical records for Brett Lovelace;
10. Mid-South Pediatrics medical records;
11. Crittenden Regional Hospital medical records;
12. Dr. Samuel Meredith's medical records;
13. Crossridge Community Hospital medical records;
14. UT Medical Group's medical records;
15. Dr. Mark Clemons' CV;
16. Dr. Jay Werkhaven's CV;
17. Dr. Jerome Thompson's CV;
18. Kelly Kish, R.N.'s CV;
19. Diane Dowdy, R.N.'s CV;
20. Edward Brundick, III, CIME, CFP's CV;
21. Dr. Clemons' medical illustrations (2);
22. LeBonheur second floor schematics diagram;
23. State of Tennessee Nursing Board Allegations Report;
24. Tennessee Board of Nursing Agreed Order re: Kelly Kish, R.N.;

Dr. Clemons may offer the following documents as exhibits:

25. Crittenden Regional Hospital Mid-South Minor Med medical records of Helen

Lovelace;

26. Coast to Coast HealthStop medical records of Helen Lovelace;
27. Women's Clinic of Forrest City medical records of Helen Lovelace;
28. Day Spring Behavioral Services medical records of Helen Lovelace;
29. Department of Veteran Affairs medical records of Daniel Lovelace;
30. Any exhibits identified by co-defendants, Dr. Paidipalli and Pediatric Anesthesiologists, P.A.;
31. Any pleadings filed in this cause;
32. Any exhibits to any depositions taken in this cause;
33. Any exhibits identified by plaintiffs.

Respectfully submitted,

LEWIS THOMASON

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Attorneys for Defendant, Mark P. Clemons

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via U.S. Mail, first class postage prepaid, and via the Court's ECF filing system:

Mr. Mark Ledbetter
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254 Court Avenue, Suite 305
Memphis, TN 38103
Mark794@aol.com

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The Hardison Law Firm
119 South Main Street, Suite 800
Memphis, TN 38103
bgilmer@hard-law.com

s/Marcy Dodds Magee
Marcy Dodds Magee

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